



1125 Atlantic Avenue
Atlantic City, NJ 08401
Phone 609-344-3161
Toll Free 800-529-3161
Fax 609-344-0939
www.cooperlevenson.com

ALYSON TOMLJENOVIC
Also Admitted to PA Bar
EMAIL: atomljenovic@cooperlevenson.com

Direct Phone (609) 572-7438
Direct Fax (609) 572-7439
File No. 47597.00009

January 17, 2012

Via Electronic Filing

Honorable Karen M. Williams
United States District Court, District of New Jersey Camden
Mitchell H. Cohen Federal Courthouse
1 John F. Gerry Plaza, Fourth & Cooper Streets
Camden, NJ 08101

Re: Alavez-Lopez, et al vs. South Jersey Sanitation Company, Inc. and Anthony Colarsurdo
Docket No. 1:10-cv-05647-NLH -KMW

Dear Judge Williams:

Please consider this letter as my request for Your Honor to extend the discovery period in the above-entitled matter or, in the alternative, to hold a telephonic management conference regarding the same.

Our office had scheduled the depositions of the plaintiffs throughout the weeks of January 16, 2012 and January 23, 2012. Counsel for plaintiffs, Richard Swartz, Esquire, filed a Motion for a Protective Order, which is returnable February 6, 2012. Our office will be submitting an opposition to that motion before this Court. With the consent of counsel, the scheduled depositions of plaintiffs were adjourned pending the outcome of this Court's ruling.

The current discovery end date is February 17, 2012. With the consent of Plaintiffs' counsel, I am requesting that this Court grant a thirty (30) day extension so that we will have the opportunity to depose plaintiffs after this Court has ruled on the Motion for a Protective Order. In the alternative, I ask that the Court schedule a brief telephone conference between Mr. Swartz and myself in order to discuss a different time period.

Thank you for your attention to this matter.

Respectfully submitted,

s/ Alyson Tomljenovic
Alyson Tomljenovic

cc: Richard Swartz, Esquire
CLAC 1715017.1